## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DEBRA NICHOLL-KENNER,

Docket No.: 3:11-cv-00195-MLC-DEA

Plaintiff,

A Civil Action

v.

LAWRENCEVILLE UROLOGY, P.A., PREMIER UROLOGY ASSOCIATES, LLC, AND JULIE PRETTYMAN,

Defendants.

## <u>DEFENDANTS' MOTION TO AMEND</u> THEIR ANSWER AND AFFIRMATIVE DEFENSES

TO: Ari R. Karpf, Esquire
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Bensalem, PA 19020
Attorneys for Plaintiff Debra Nicholl-Kenner

PLEASE TAKE NOTICE that, on Monday, May 2, 2011, the undersigned attorneys will move the United States District Court for the District of New Jersey for an Order allowing Defendants Lawrenceville Urology, P.A., Premier Urology Associates, LLC, and Julie Prettyman (collectively, "Defendants") to amend their answer and affirmative defenses ("Motion"). In support of the Motion, the Defendants shall rely on the annexed Certification of Alan C. Milstein.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Rule of Civil Procedure 7.1(d)(2), any opposition to the relief requested in the Motion shall be filed with the Clerk of Court and served upon the undersigned counsel at least fourteen (14) days prior to the return date of the Motion.

## PLEASE TAKE FURTHER NOTICE that a proposed form of Order incorporating the

relief sought is submitted herewith.

Dated: Wednesday, April 6, 2011

Respectfully submitted,

SHERMAN, SILVERSTEIN, KOHL,

ROSE & PODOLSKY, P.A.

By:

/s/ Alan C. Milstein

Alan C. Milstein

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Attorneys for Defendants Lawrenceville Urology, P.A., Premier Urology Associates, LLC, and Julie

Prettyman